

ATTORNEYS AT LAW

JOHN M. BLUME  
(1932-2020)  
CAROL L. FORTE♦  
MICHAEL B. ZERRES♦  
JOHN E. MOLINAR I♦  
MITCHELL J. MAKOWICZ, JR.♦  
JEFFREY J. ZENNA♦  
KENNETH W. ELWOOD♦  
HARRIS S. FELDMAN♦  
RICHARD J. VILLANOVA♦  
NORBERTO A. GARCIA♦  
ABRAHAM N. MILGRAUM  
ROBIN A. DONATO  
CONNOR C. TURPAN  
BRIAN M. RIEHL  
RICHARD T. MADURSKI  
TERRENCE J. HULL

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Of Counsel  
RONALD P. GOLDFADEN♦  
CYNTHIA M. CRAIG  
BRIAN E. MAHONEY  
DAVID M. FRIED♦  
FREDERICK D. MICELI♦

♦ Certified by the Supreme Court of  
New Jersey as a Civil Trial Attorney

# BLUME FORTE FRIED ZERRES & MOLINARI

A PROFESSIONAL CORPORATION

ONE MAIN STREET  
CHATHAM, NEW JERSEY 07928

WWW.NJATTY.COM

(973) 635-5400  
FAX: (973) 635-9339

OTHER OFFICES:  
JERSEY CITY, NJ 07306  
NORTH BERGEN, NJ 07047  
SEA GIRT, NJ 08750

June 26, 2024

## **VIA EMAIL**

U.S.M.J. Justin T. Quinn, U.S.D.J.  
Clarkson S. Fisher Building  
& U.S. Courthouse  
402 East State Street  
Trenton, NJ 08608

**RE: Szemple v. Rutgers University, et al.**

Case No.: 3:19-cv-12746 & 3:19-cv-13300  
Our File No.: 2301851

Dear Magistrate Quinn:

I was appointed by the Court to represent the *Pro Se* Plaintiff in this matter in a limited capacity on two discrete legal issues. The first was to advise the plaintiff on the feasibility of obtaining an Affidavit of Merit in this case. The second was to review the matter, consult with the *Pro Se* Plaintiff, and then advise the Court why one of the two related cases should not be dismissed as duplicative. (3:19-cv-13300 and 3:19-cv-12746) I have conferred with Plaintiff several times, and as the Court is aware I am presently attempting to obtain a complete set of the relevant institutional and medical records so that I can advise the plaintiff on the Affidavit of Merit issue.

At the same time, I have spoken to the *Pro Se* Plaintiff regarding the two related matters and have determined with his assistance that while there is substantial overlap between the two claims, they do raise separate factual

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contentions and implicate different legal issues. With that in mind, the *Pro Se* Plaintiff has advised that he will consent to consolidating the matters in order to streamline the litigation for the Court and the parties involved. Unless there is objection by one of the parties, I ask that the Court enter an order consolidating the matters to alleviate the necessity for motion practice.

Respectfully Submitted,



HARRIS S. FELDMAN

HSF/rd